

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Wheatland Tube Company
4435 South Western Boulevard
Chicago, Illinois 60609**

ATTENTION:

**Robert Werth
Environmental Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Wheatland Tube Company (Wheatland Tube or you) to submit certain information about the facility at 4435 South Western Avenue, Chicago, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 30 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Wheatland Tube owns and operates an emission source at the Chicago, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Illinois State Implementation Plan, the National Emission Standards for Hazardous Air Pollutants, and your Title 5 Operating Permit.

Wheatland Tube must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Wheatland Tube must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

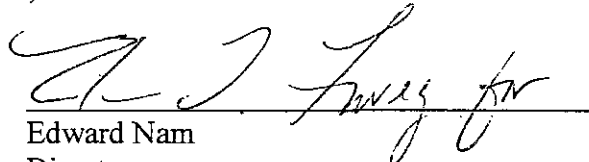
This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Wheatland Tube to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Linda H. Rosen, at (312) 886-6810, or Jason Schenandoah, at (312) 886-9506.

11/30/17
Date



Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission on physical media such as compact disk, flash drive or other similar item.
4. Provide a table of contents for each compact disk or flash drive containing electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. *We recommend the use of electronic file folders organized by question number.* In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, the Illinois State Implementation Plan, or the National Emission Standards for Hazardous Air Pollutants.

Appendix B

Information You Are Required to Submit to EPA

Wheatland Tube Company (Wheatland Tube) must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) within thirty (30) days of receipt of this Request.

1. Provide a narrative description of the facility's manufacturing processes, including, but not limited to: slitting, rolling, forming, welding, coating, galvanizing, and HCl cleaning. Provide the name and identification number of each item of process equipment and provide a diagram showing the location of each item of process equipment within the facility. Describe all raw materials used and products made. In your written description and on the diagram, identify and describe all sources of air pollution.
2. Provide a narrative description of all air pollution control equipment at the facility. Provide the identification number of each air pollution control device at the facility. On the diagram submitted in response to request 1, above, indicate the location of each air pollution control device within the manufacturing process.
3. Provide a narrative description of all air emission and operating parameter monitoring devices installed on process or air pollution control equipment at the facility (e.g., pressure drop). Provide the make and model, span, calibration procedures, date of installation, location of equipment (which process or control equipment) and frequency of monitoring and recording of the devices.
4. For each coating line (or operation) at the facility:
 - (a) Describe the activity of each coating line; the purpose of the coatings applied; the application method of the coatings; the substrate on which the coatings are applied; description of drying, baking or curing method; and the location of the coating line within the process and facility (e.g., Mill 1, Building 1);
 - (b) Provide the installation date of the coating line. Indicate whether the installation was a like-for-like replacement of a previous coating line or a new item of equipment;
 - (c) Explain the location of all air pollution control devices within each coating line and indicate when the air pollution control devices were installed;
 - (d) Describe all monitoring performed on the coating line and/or on the coating line's air pollution control equipment;
 - (e) For the period January 1, 2014 to the date of receipt of this request, provide the name and identification number of each coating as applied each day on each coating line. For the interior tube coatings, provide the outside diameters of the electrical metal tubing (conduit) being coated. For coating used on the exterior of tubes, state whether the coating is an ultra-violet (UV) coating and/or a clear coating.

- (f) For the coatings provided in response to item 4.e., above, state which coatings are or were "one component coatings," "multicomponent coatings," "metallic coatings," "air-dried coatings" or "baked coatings," as those terms are defined in 35 Ill. Admin. Code Part 211.
- (g) For the period January 1, 2014 to the date of receipt of this request, provide the weight of volatile organic material (VOM) per volume of each coating (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
- (h) For the period January 1, 2014 to the date of receipt of this request, for coating lines subject to the limitations of 35 IAC § 218.204(q) (specify which coating lines this applies to), provide the weight of VOM per volume of solids in each coating, as applicable, as applied each day on each coating line;
- (i) For the period January 1, 2014 to the date of receipt of this request, were any thinners and/or other additives added to the coatings prior to being applied and, if so, were the additions of thinners and/or other additives addressed in your determination of the weight of VOM per volume of each coating (or coating solids) applied?
- (j) For the period January 1, 2014 to the date of receipt of this request, if the addition of thinners and/or other additives were not accounted for in the determination of the weight of VOM per volume applied, provide the weight of VOM per volume of each thinner and additive (minus water and any compounds that are specifically exempted from the definition of VOM) as applied each day on each coating line;
- (k) For the period January 1, 2014 to the date of receipt of this request, list and describe all cleanup materials used in the mills and list their VOM content.
- (l) For the period January 1, 2014 to the date of receipt of this request, provide the gallons applied of each coating listed in response to item 4.e., above for each day and for each month. Explain how that volume was determined and provide copies of supporting documentation.
- (m) For the period January 1, 2014 to the date of receipt of this request, provide the gallons applied of each thinner or other additive listed in response to item 4.j., above, for each day and for each month. Explain that volume was determined and provide copies of supporting documentation.
- (n) For the period January 1, 2014 to the date of receipt of this request, provide the gallons of each cleanup material used per month in the mills. Explain how that volume was determined and provide copies of supporting documentation.
- (o) For the period January 1, 2015 to the date of receipt of this request, provide the monthly VOM emissions required to be calculated by 4.1.c.ii.C.II. of your Clean Air Act Permit, No. 96030029 (Title 5 permit) and explain how the monthly emissions were calculated.
- (p) For each coating, thinner and/or other additive, and cleanup material listed in response to items 4.e., 4.j. and 4.k., above, provide copies of information provided by material suppliers or manufacturers, such as manufacturers' formulation data, certified product sheets and/or test data used to determine the weight of VOM per volume of material (excluding water and exempt compounds), weight percent VOM, density and/or the weight of VOM per volume of coating solids as applied each day on each coating line. If you have ever conducted testing to determine the VOM content, density or volume fraction of coating solids for these materials, provide

copies of these test reports. If the manufacturer or supplier conducted testing, provide all copies of the summary sheet of the test results.

- (q) State which requirement in 40 C.F.R. Part 218, Subpart F and your Title 5 permit applies to each coating used on each coating line.

5. The following questions pertain to the National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products (Miscellaneous Metal Parts and Products NESHAP), 40 C.F.R Part 63, Subpart M, and your Title 5 permit. Provide the following information for each coating line for the period January 1, 2014 to the date of receipt of this request.

- (a) For each compliance period under the NESHAP, state which compliance option each coating line used and state the time periods (beginning and ending dates and times) for each option used;
- (b) Provide the name and volume of each coating, thinner and/or other additive and cleaning material used during each compliance period (list the materials by type). In the alternative, provide purchase records for each material used if the compliant material option was the only option used during this period. Note that "cleaning material" is defined in 40 C.F.R. § 63.3981 as a solvent used to remove contaminants and other materials, such as dirt, grease, oil and dried or wet coating from a substrate before or after coating application or from equipment associated with a coating operation.
- (c) For the coatings provided in response to item 5.b., above, state which coatings are or were "general use coatings", "high performance coatings," "rubber-to-metal coatings," "magnet wire coatings" or "extreme performance fluoropolymer coatings," as defined in 40 C.F.R. § 63.3981 of the Miscellaneous Metal Parts and Products NESHAP.
- (d) Provide the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period;
- (e) Provide the volume fraction of coating solids for each coating used during each compliance period;
- (f) Provide the HAP content in each coating in pounds organic HAP per gallon coating solids used during each compliance period;
- (g) For each compliance period, if you used the compliant material option, provide a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 C.F.R. § 63.3941;
- (h) For each compliance period, if you used the emission rate without add-on controls option, provide records of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of 40 C.F.R. § 63.3951; and, if applicable, the calculation used to determine the mass of organic HAP in waste materials; the calculation of the total volume of coating solids used each month using Equation 2 of 40 C.F.R. § 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 C.F.R. § 63.3951;

- (i) If the emission rate without add-on control option was ever used, provide the density for each coating, thinner, and/or other additive, and cleaning material used during each compliance period;
 - (j) If you are using the emission rate without add-on controls compliance option and are taking credit for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage and disposal facility (TSDF), then provide the information required to be kept by 40 C.F.R. § 63.3930(h);
 - (k) Provide copies of information provided by material suppliers or manufacturers, such as manufacturer's formulation data, or test data (including your own test data) used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you have ever conducted testing yourself or used testing information provided by the manufacturer or supplier of the material to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating, provide copies of the summary sheets of the test results provided by the manufacturer or supplier.
6. List any solvents, solutions, or cleaning materials used at the facility that have not been listed in response to questions 1-5 of this Information Request. Explain where and why these materials are used in the manufacturing process and provide their VOM and HAP content. Provide copies of information such as manufacturers' formulation data, certified product sheets and/or test data (either yours or the manufacturers or suppliers) used to determine the VOM content and HAP content of the materials.
7. Provide copies of the reports and results of all stack tests and emission tests for any pollutant conducted on any of the processes at the facility since January 1, 2012. Include in your response the results of any emission testing that was done for internal purposes for any reason even if such testing did not follow reference methods and even if such testing or test results were not reported to Illinois EPA or EPA.
8. Provide all dates, times and durations of any and all malfunctions (including unplanned shutdowns) of process equipment, emission control equipment and continuous emission monitoring or continuous parameter monitoring devices for the period January 1, 2014 to the date of receipt of this request. For each malfunction or unplanned shutdown, describe the cause and any corrective actions taken.
9. Provide copies of the semi-annual monitoring reports and any other semi-annual or quarterly reports required to be submitted to the Illinois EPA by your Title 5 Operating Permit for the period January 1, 2014 to the date of receipt of this request, except you do not have to submit the semi-annual monitoring report dated January 25, 2017.
10. Provide copies of records of pressure drop monitoring data for each control device at the facility for the period January 1, 2014 to the date of receipt of this request.

11. Provide copies of records indicating your inspections, maintenance activities, corrective actions and equipment replacements (e.g., cartridges, scrubber liquid) for each control device at the facility and for each pressure drop monitoring device at the facility for the period January 1, 2014 to the date of receipt of this request.
12. Provide copies of all deviation reports submitted to the Illinois EPA for the period January 1, 2014 to the date of receipt of this request.
13. Provide copies of your Initial Notification and Notification of Compliance Status submitted to either the Illinois EPA or the EPA pertaining to the Miscellaneous Metal Parts and Products NESHAP.
14. For the period January 1, 2014 to the date of receipt of this request, provide copies of all semi-annual reports submitted pursuant to 40 C.F.R. § 63.3920 of the Miscellaneous Metal Parts and Products NESHAP.
15. Provide copies of all Illinois EPA construction permits that have been issued to your facility, including but not limited to, construction permits Nos. 86090026, 96110025, and 02050066 referenced in your Title 5 permit.
16. Provide a copy of your 2016 Annual Emission Report and describe in detail how the tons/year were calculated for xylene, HCl, toluene, and any other HAP.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A), (B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R. Part 2. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show: that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as

substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I certify that I sent a Request to Provide Information Pursuant to the Clean Air Act by

Certified Mail, Return Receipt Requested, to:

Robert Werth, Environmental Manager
Wheatland Tube Company
4435 South Western Boulevard
Chicago, Illinois 60609

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Julie Armitage, Chief
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue
East Springfield, Illinois 62794

On the 1st day of December 2017.

Kathy Jones

Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER:

7001 0320 006 0185 6678